

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
Akron Division**

Drips Holdings, LLC,

Petitioner,

V.

QUOTEWIZARD.COM, LLC,

Respondent.

Misc. Action No. _____

Arising from Civil Action No. 1:19-cv-12235-LTS, pending in the United States District Court for the District of Massachusetts

**DRIPS HOLDING, LLC’S MOTION TO QUASH
SUBPOENA TO PRODUCE DOCUMENTS**

Pursuant to Federal Rules of Civil Procedure 45(d)(3), Drips Holdings, LLC (“Drips”) moves this Court to quash the subpoena issued by QuoteWizard.com LLC on March 2, 2021 (the “Subpoena”).

As detailed in the attached Memorandum of Law, Drips would suffer undue burden if it is required to comply with the Subpoena, which alone warrants quashing the Subpoena under Rule 45(d)(3). Further, requiring Drips to undertake the massively burdensome effort that would be required to collect and produce the requested records at a stage in the proceeding when the records are not yet pertinent, and may never be, is disproportionate to the needs of the case and antithetical to the purposes of the Federal Rule's limits on permissible discovery and the more stringent limitations applicable to nonparty discovery under Rule 45. Accordingly, Drips requests that the Court enter an order quashing the Subpoena in its entirety under Rule 45(d)(3).

Date: March 12, 2021

SQUIRE PATTON BOGGS (US) LLP

/s/Jesse L. Taylor

Jesse L. Taylor (0088209)
jesse.taylor@squirepb.com)
SQUIRE PATTON BOGGS (US) LLP
41 South High Street
Columbus, OH 43215
(614) 365-2700 (Phone)
(614) 365-2499 (Fax)

Eric J. Troutman (*pro hac vice* forthcoming)
eric.troutman@squirepb.com
Squire Patton Boggs (US) LLP
555 South Flower Street, 31st Floor
Los Angeles, CA 90071
(213) 689-6510 (Phone)
(213) 623-4581 (Fax)

Counsel for Drips Holdings, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2021, a copy of the foregoing was served via email to the following counsel of record in the underling matter:

Matthew P. McCue
THE LAW OFFICE OF MATTHEW P. MCCUE
1 South Avenue, Suite 3
Natick, MA 01760
Telephone: (508) 655-1415
mmccue@massattorneys.net

Edward A. Broderick
BRODERICK LAW, P.C.
176 Federal Street, Fifth Floor
Boston, MA 02110
Telephone: (617) 738-7080
ted@broderick-law.com

Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(508) 221-1510
anthony@paronichlaw.com

Alex M. Washkowitz
Jeremy Cohen
CW LAW GROUP, P.C.
188 Oaks Road Framingham, MA 01701
alex@cwlawgrouppc.com

Counsel for Plaintiff Joseph Mantha

Kevin P. Polansky
kevin.polansky@nelsonmullins.com
Christine M. Kingston
christine.kingston@nelsonmullins.com
NELSON MULLINS RILEY & SCARBOROUGH LLP
One Financial Center, Suite 3500
Boston, MA 02111
(t) (617)-217-4700
(f) (617) 217-4710

Counsel for Defendant QuoteWizard, LLC

/s/Jesse L. Taylor